

## Redacted

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**From:** Redacted  
**Sent:** 28 January 2019 11:05  
**To:** Redacted  
**Subject:** DRS - announcement Programme for Government - letter - Redacted - 12 September 2017  
**Attachments:** DRS Announcement - Programme for Government.pdf; KSB DRS Sub Group submission 26.04.17.pdf

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**From:** Redacted  
**Sent:** 12 September 2017 14:57  
**To:** Redacted  
**Subject:** Circular Economy - Keep Scotland Beautiful - Deposit Return announcement in Programme for Government 2017-18 - letter - September 2017

Dear Redacted,

On behalf of Redacted, I'd like to thank you for your correspondence to Keep Scotland Beautiful informing us of the Deposit Return announcement in Programme for Government 2017-18.

Please find attached Redacted response, and for your information, a copy of our latest DRS position statement.

Should you have any queries please don't hesitate to get in touch.

Kind Regards,

Redacted

Redacted  
Redacted  
Keep Scotland Beautiful

t: Redacted  
e: Redacted  
w: [Redacted](#)



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Redacted  
Deputy Director  
Environment and Forestry Directorate  
Environmental Quality Division  
Scottish Government  
Victoria Quay  
Edinburgh  
EH6 6QQ

7 September 2017

**SENT BY EMAIL**

Dear Redacted,

**DEPOSIT RETURN ANNOUNCEMENT IN PROGRAMME FOR GOVERNMENT 2017-18**

On behalf of Keep Scotland Beautiful (KSB), I should like to thank you for your correspondence to my colleague Redacted regarding the above announcement. This is clearly a very important development in Scotland's battle to deal with the significant amount of littered beverage containers that blight our country.

You will hopefully be aware of KSB's work in relation to environmental quality and the significant range of partnerships that we have across Scotland's private, public and voluntary sectors. In relation to the future shape of a DRS for Scotland, we have considerable interest in bringing our unique knowledge and expertise to the future strategic discussions that will undoubtedly take place. I should therefore ask that you note the formal request of my Board that KSB be included, where appropriate, in these conversations. We should like to play our part in ensuring that we get the best DRS system for Scotland.

Given our interest in this matter, I wonder if it would be useful to have a short meeting at your convenience. For information, I have attached a copy of our most recent position statement on DRS.

Thank you in anticipation.

Yours sincerely

Redacted  
Redacted

Enc : KSB DRS Position Statement

# Environment, Climate Change and Land Reform Committee

Deposit Return Scheme Sub-group



Submission by Keep Scotland Beautiful

MAY 2017

## Introduction

**Keep Scotland Beautiful welcomed the opportunity to meet with the Deposit Return Scheme (DRS) Sub-group recently to offer an informed perspective on the current debate about the possible development and implementation of a DRS for Scotland, particularly in relation to whether such a system will have any impact on litter and littering behaviour.**

**This submission outlines the key points we covered in our presentation to the Sub-group and the statistics used on the current position with regard to litter in Scotland.**



## Our current position

Keep Scotland Beautiful has been aware of the potential benefits and issues associated with a DRS for nearly ten years, indeed we invited the DRS industry to participate in the Litter Summit that we organised for Mike Russell and Richard Lochhead in 2007.

We have also spent a significant amount of time and resource on this issue over the last few years and have sought to take a pragmatic approach to the issue of a DRS in Scotland.

For clarity, Keep Scotland Beautiful is not opposed to the design, development and implementation of a DRS for Scotland. Indeed, we believe we would be a valuable key partner in this process, particularly given our perspective on litter.

Introducing a DRS in Scotland will, we believe, lead to a welcome increase in recycling rates and importantly reduce the volume of aluminium and plastic in the litter stream.

However, a DRS will not address fully Scotland's wider litter challenge. There is no evidence to suggest it will lead to a decrease in other regularly littered items such as food on the go packaging, cigarettes, coffee cups, chewing gum, and confectionery wrappers.

We have significant evidence that Scotland's litter problem is bad, and getting worse. Our national surveys have shown a substantial and troubling deterioration in the cleanliness of the environment.

So, although we believe a DRS will play an important role in assisting with the reduction of littering of drinks related items there are many other interventions and solutions that need to be considered alongside it to ensure the impact on litter and littering behaviour is more significant.

Scotland is not alone in facing serious challenges regarding litter - we are a leading member of the Clean Europe Network, a group of environmental NGOs and charities from across the EU with a shared vision of a litter free Europe by 2030.

Involvement in the Network has meant that we have heard a diverse range of views about DRS, from those countries that have a system and those that do not. Our Chief Executive has visited colleagues in Sweden to discuss the interaction between their DRS and litter and has just returned from a similar visit to colleagues in Denmark

In our view we can only effectively address litter and littering behaviour by putting in place an integrated approach that deploys a significant range of interventions from government, local authorities and the private sector to deliver the difference we all want to see.

That will require a renewed focus on the 2014 National Litter Strategy and the resources provided to deliver it – a DRS could be one of a number of important interventions.

We are concerned that if a DRS is not placed in the context of a broader collective effort to tackle litter and littering behaviour, it will allow industry to adopt a position that by engaging with the design, development and implementation of a DRS it has done its bit, that we will effectively let them off the hook.

We are also concerned that if we do embark on the journey to introduce a DRS, even with a fair wind and the best efforts of all involved, the timescale for design, development and implementation could take a number of years.

What will happen in the interim about litter and littering behaviour? We cannot allow a DRS to be a distraction, or a get-out clause, from the sustained, coordinated and collaborative approach needed to address litter and littering behaviour in Scotland.

We are keen to ensure that a DRS for Scotland delivers the best possible outcome for everyone. We believe that a move towards implementing a DRS is best set in the context of wider societal measures and a move towards a more circular economy. In particular, one which encourages improved producer responsibility for packaging and other waste.

We should not underestimate the hard work and challenges that lie ahead if a DRS is to be implemented in Scotland. It is vital that a system is designed collaboratively to ensure that it works for everyone, and effectively integrates with other elements of the waste management infrastructure.

It is also crucial that any system minimises overall carbon emissions and does not create new, alternative, negative environmental impacts for example in the collection of materials for recycling.

Keep Scotland Beautiful can play a key role in engaging the hearts and minds of people in communities across Scotland for the system, and bring together the diverse interests involved. We will engage with the Scottish Government, Zero Waste Scotland, our local authorities, industry, our community contacts and other key stakeholders to ensure that any proposed system is designed and implemented effectively.

We have reached out to our colleagues in Association for the Protection of Rural Scotland (APRS) and Have You Got the Bottle (who have helped raise the profile of DRS) to discuss the best way forward. We have also sought to capitalise on our existing relationships with industry to bring them to the table and recognise that they have a key role to play in tackling litter and littering behaviour.

A Scottish DRS will not be the 'silver bullet' that solves Scotland's litter problem. It can, if designed and implemented effectively with the full involvement of all stakeholders, form an important element in a wider strategy to improve Scotland's environment and in particular, to tackle litter.

Keep Scotland Beautiful would be happy to engage further with the Sub-group if required on this issue or answer any questions arising from other evidence sessions. We would also be willing to provide evidence formally to the Environment, Climate Change and Land Reform Committee (ECCLR) Committee on this matter if that was something the Committee felt would be helpful.

## Litter Statistics - May 2017

We have provided below a short overview of the research and evidence that we have gathered over the last few years that support our concerns regarding the potential impact of a DRS on litter and littering behaviour.

This research and evidence illustrates why we have maintained a balanced approach to the issue of DRS to ensure that important questions regarding the ability of any system to make a positive contribution to tackling litter and littering behaviour are not ignored.

## LEAMS - 2016/17

The Local Environmental Audit and Management System (LEAMS) is the only national indicator for street cleansing services in Scotland. Each year more than 15,000 sites are assessed for cleanliness in a partnership between Keep Scotland Beautiful and the local authorities.

The following figures are taken from the early information available for the 2016/17 surveys:

Drinks related litter present on **38% of sites** surveyed (increase of 6% from 2015/16).

Drinks related litter present on **70% of roadsides** (principally A roads).

### Litter count survey 2016

(Based on litter counts across four local authority areas)

Cigarettes	35% of total count
Gum	49% of total count
<b>Drinks containers</b>	<b>5% of total count</b>

This shows that if cigarette and gum related litter are discounted (as less visible items) drinks related litter makes up 20% of the total remaining items.



## Attitudinal Surveys

Over the last two years, we have commissioned YouGov to undertake research to establish attitudes to litter and littering behaviour to inform our work in this area.

The information below shows the variation in response when asked about the litter items that are most noticeable in each environment.

In communities	On roadsides
<b>Litter noticed the most</b>	<b>Litter noticed the most</b>
Cigarettes 58% Drink containers 55% Food and packaging 50%	Drink containers 68% Food and packaging 61% Carrier bags 33%
<b>Ways to change behaviour</b>	
More bins 59% Education 44% Double fine level 40% DRS 39%	
<b>Ways to reduce litter</b>	
More bins 57% Education 43% DRS 39%	

Keep Scotland Beautiful is the charity that campaigns, acts and educates on a range of local, national and global environmental issues to change behaviour and improve the quality of people's lives and the places they care for. We are committed to making Scotland clean, green and more sustainable.



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